

DELTA WETLANDS PROJECT

September 23, 2008

Mr. Phil Isenberg, Chair Delta Vision Blue Ribbon Task Force California Resources Agency 1416 Ninth Street Sacramento, CA 95814

RE: Delta Vision Strategic Plan, Fourth Staff Draft

Dear Mr. Isenberg,

In line with prior correspondence with and comment to the Task Force, I submit the following recommendations for change to the Fourth Staff Draft Strategic Plan.

- 1. The Strategic Plan needs to have a clear and positive vision for the physical Delta (levees, islands and channels). This is especially important because the Strategic Plan calls for an isolated conveyance around the Delta, which many fear will consign the Delta to official neglect. Unfortunately, as currently framed, Goal 2 is little more than a marketing program and Goal 6 is geared to keep levee investments small, rather than effective. Neither goal will provide meaningful protection to the physical Delta. Attached for your reference is the specific language to strengthen the Strategic Plan's Delta protections that was submitted informally at your last meeting.
- 2. The physical Delta needs full protection while the proposed Council decides on a long term Delta strategy. This means that the State's historic commitment to levee improvements and the repair of levee breeches should continue unabated. To that end, the language cited on the attachment and starting in Volume 2, page 43, at line 6 should be deleted. If such a policy were to be adopted, it should only be done after a fully informed policy determination, not before one even starts.
- Finally, the Strategic Plan should take notice of the potential for on-island, in-Delta flood control measures. The Jones & Stokes study submitted to you previously showed that relatively simple flood control features on Delta islands could provide meaningful flood relief.

Anson B. Moran, General Manager 1660 Olympic Blvd., Suite 350 Walnut Creek, CA 94596 Telephone (415) 730-5637 • Page 2 Anson B. Moran

Thank you again for the opportunity to provide comment and input to the Vision and the Strategic Plan.

Sincerely,

Anson B. Moran General Manager

Member, Stakeholder Coordination Group

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Attachment

Combine goal 2 and Strategies 6.1 and 6.3 into a single goal to protect the Delta as place.

New Goal 2

Protect the Delta, a unique and valuable place, by making cost-effective investments in political, legal and physical infrastructure designed to preserve the economy and character of the Delta, to the maximum extent feasible.

Keep Strategy 2.1 and Actions 2.1.1 through 2.1.4 as is

New Strategy 2.2 (replacing former Strategy 6.1)

Design and execute a comprehensive, cost-effective program of levee maintenance and improvement to minimize long term, unintended changes to the physical Delta (i.e., levees, channels and Islands), to the maximum extent feasible.

New Actions (replacing Actions 6.1.1 through 6.1.7)

- 2.2.1 As a near term action, CDEW should appoint a Levees Task Force including reclamation district representatives and engineers to develop a Comprehensive Strategy for Maintaining the Physical Delta to address seismic risk, climate change, subsidence and sea level rise in order to achieve Delta Vision goals.
- 2.2.1.1 The Levees Task Force should involve staff and information from DPC, BCDC, SWRCB, CDFG, BDCP, DRMS, DWR, local governments and land owners as appropriate in developing a Comprehensive Strategy for Maintaining the Physical Delta to minimize long term, unintended changes to the Delta land form to the maximum extent feasible.
- 2.2.1.2 The Comprehensive Strategy for Maintaining the Physical Delta should consider values to be protected, economic resources available for protecting such values, existing land uses, and modified land uses where necessary or advantageous.
- 2.2.1.3 The Levees Task Force should, by 2009, determine the target levels of levee protection, appropriate levee configurations, and recommended priorities for upgrading levees, necessary to implement the Comprehensive Strategy for Maintaining the Physical Delta.
- 2.2.2 Require DWR, by 2010, to adopt a levee policy to implement the Comprehensive Strategy for Maintaining the Physical Delta.
- 2.2.3 Continue the levee subventions program and revise as appropriate to be consistent with the Comprehensive Strategy for Maintaining the Physical Delta.

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New Strategy 2.3 (replacing former Strategy 6.3)

Achieve levels of emergency protection consistent with federal and state policies

New Actions (copying and replacing former Actions 6.3.1 through 6.3.4)

- 2.3.1 Complete a collaboratively prepared Delta-wide regional response plan by 2010 which establishes mechanisms for regional coordination of life safety, evacuation, animal control, and levee flood fighting functions where needed.
- 2.3.2 Embark on a comprehensive series of emergency management and preparation actions, beginning immediately.
- 2.3.3 Complete a comprehensive analysis of the costs and benefits of highway protection strategies, and adopt a policy based on its findings by 2012.
- 2.3.4 Complete a comprehensive analysis of the costs and benefits of infrastructure protection strategies, and adopt a policy based on its findings by 2012.

Note1: Details of former Action 6.3.1, now Action 2.3.1 above, in Volume 2, Page 43, line 6 are now inconsistent with the goal of minimizing long term, unintended changes to the physical Delta and should be deleted as follows:

Note2: Strategy 6.2 is now an orphan and should, perhaps, be elevated to a separate goal dealing with land use and life safety.

Deleted: 8. In the event of a levee failure prior to the finalization of a Delta-wide CDEW Plan, response should consider not only immediate repair and pump-out, but other options. These include no action pending considered evaluation of consequences, and breach repair and rest, pending benefit/cost analysis. Major actions and upgrades should await completion of comprehensive planning.